

This form will report compliance with your permit as determined by an NRW officer

Site	Magor Brewery EPR/BX7282IS				Permit Ref	BX7282IS		
Operator/ Permit holder	AB InBev UK Ltd							
Date	29/10/2015				Time in	10:00	Out	14:30
What parts of the permit were assessed	Accident management plan							
Assessment	Site Inspection	EPR Activity:	Installation	X	Waste Op		Water Discharge	
Recipient's name/position	Kathryn Fowler							
Officer's name	David A Willey				Date issued	09/11/2015		

Section 1 - Compliance Assessment Summary

This is based on the requirements of the permit under the Environmental Permitting Regulations. A detailed explanation and any action you may need to take are given in the "Detailed Assessment of Compliance" (section 3). This summary details where we believe any non-compliance with the permit has occurred, the relevant condition and how the non-compliance has been categorised using our Compliance Classification Scheme (CCS). CCS scores can be consolidated or suspended, where appropriate, to reflect the impact of some non-compliances more accurately. For more details of our CCS scheme, contact your local office.

Permit Conditions and Compliance Summary

Condition(s) breached

a) Permitted activities	1. Specified by permit	N	
b) Infrastructure	1. Engineering for prevention & control of pollution	A	
	2. Closure & decommissioning	N	
	3. Site drainage engineering (clean & foul)	A	
	4. Containment of stored materials	A	
	5. Plant and equipment	A	
c) General management	1. Staff competency/ training	N	
	2. Management system & operating procedures	A	
	3. Materials acceptance	N	
	4. Storage handling, labelling, segregation	A	
d) Incident management	1. Site security	A	
	2. Accident, emergency & incident planning	A	
e) Emissions	1. Air	A	
	2. Land & Groundwater	N	
	3. Surface water	N	
	4. Sewer	A	
	5. Waste	N	
f) Amenity	1. Odour	N	
	2. Noise	N	
	3. Dust/fibres/particulates	N	
	4. Pests, birds & scavengers	N	
	5. Deposits on road	N	
g) Monitoring and records, maintenance and reporting	1. Monitoring of emissions & environment	N	
	2. Records of activity, site diary, journal & events	N	
	3. Maintenance records	A	
	4. Reporting & notification	N	
h) Resource efficiency	1. Efficient use of raw materials	N	
	2. Energy	A	

KEY: C1, C2, C3, C4 = CCS breach category (* suspended scores are marked with an asterisk),

A = Assessed (no evidence of non-compliance), N = Not assessed, NA = Not Applicable, O = Ongoing non-compliance – not scored

Number of breaches recorded	0	Total compliance score (see section 5 for scoring scheme)	0
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If the Total No Breaches is greater than zero, then please see Section 3 for details of our proposed enforcement response

Section 2 – Compliance Assessment Report Detail

This section contains a report of our findings and will usually include information on:

- the part(s) of the permit that were assessed (e.g. maintenance, training, combustion plant, etc)
- where the type of assessment was 'Data Review' details of the report/results triggering the assessment
- any non-compliances identified
- any non-compliances with directly applicable legislation
- details of any multiple non-compliances
- information on the compliance score accrued inc. details of suspended or consolidated scores.
- details of advice given
- any other areas of concern
- all actions requested
- any examples of good practice.
- a reference to photos taken

This report should be clear, comprehensive, unambiguous and normally completed within 14 days of an assessment.

AB InBev meeting 29th October 2015

1. Site update / previous actions
 - a. CAR Form 13/01/15
 - b. SABMiller AB Inbev
2. HCL incident
 - a. Entec bund audit 2010
 - b. AMEC bund survey
 - c. Associated actions
 - d. AMP and PMP
3. OMA
4. BREF BATc update - 2016
5. Monitoring returns
6. Drain project update
7. OPRA profile
8. Site health and safety
9. EED / MCPD / ESOS
10. Site tour / inspection

1. Site update / previous actions

The action from the CAR Form issued following the site visit on the 13th January 2015 has been completed. AB InBev submitted a report into the investigation of the exceedences of the H2S and SO2 ELVs at the ETP. NRW are satisfied that the breaches reported were as a result of the negative values sent to the SCADA software and how the SCADA software interprets this data. This has now been rectified.

KF provided an update on the takeover of SABMiller. At present there is no indication of any changes to Magor Brewery in regard to expansion or additional brewing lines.

The AB InBev Stag plant in London will be closing in December 2015. This will result in a 400,000 bottling line at the Magor Brewery with additional jobs created.

KF also discussed changes to the staffing structure that will see an engineering compliance post being created. This will enable the permitting requirements and other regulatory regimes to be implemented directly at the engineering level.

KF discussed that the contract for the running of the ETP is up for renewal and AB InBev are in the process of going through the tenders. This may result in a change to the company operating the ETP. This will not require a permit variation as AB InBev remain responsible for the ETP. If there is a change to the running of the ETP then updated operating procedures may be required to be submitted to NRW.

There is the possibility that the sludge will be dewatered at the ETP therefore reducing the

removal costs associated with the waste.

The safety video has also been updated at the site for the Health and Safety induction.

2. HCL incident

The HCL incident on the 23rd June 2015 has been detailed in the CAR Form issued on the 16th September 2015. As a result of the incident there were some associated actions. These were:

ACTION 1: AB InBev to provide details of the bund survey undertaken by AMEC for all the other tank storage areas on site and determine their suitability in line with CIRIA 736.

ACTION 2: Update the AMP in line with the appropriate tank specifications for the different chemicals stored on site.

ACTION 3: Update the AMP to include notification to NRW of any incidents.

ACTION 4: Provide a copy of the maintenance programme in place at AB InBev as required by condition 2.3.6.1. This can form part of the AMP or a standalone Preventative Maintenance Plan.

ACTION 5: Inform NRW of the specifications of the new HCL tank as well as the storage capacity of the new tank.

The first action has been completed with KF supplying a copy of the AMEC report that incorporates the previous ENTEC report. The report indicated that 26 out of the 28 bunds do not hold capacity. As a result of this AB InBev have identified the bunds and tanks that require upgrading with associated risk factors. They will then put forward a long term replacement programme to ensure all tanks are appropriately bunded therefore limiting the risk of a potential incident on site.

AB InBev have committed to AMEC reviewing the bund status each year.

In addition to this programme of upgrades AB InBev will also be revising their accident management plan accordingly to build in the maintenance regime, upgrade timescales as well as a more detailed approach identifying potential accidents and emergency measures.

ACTION: NRW to supply reference documentation to AB InBev to assist in the formulation of the revised AMP.

ACTION: (Carried forward) Update the AMP in line with the appropriate tank specifications for the different chemicals stored on site.

ACTION: (Carried forward) Update the AMP to include notification to NRW of any incidents.

ACTION: (Carried forward) Provide a copy of the maintenance programme in place at AB InBev as required by condition 2.3.6.1. This can form part of the AMP or a standalone Preventative Maintenance Plan.

Action 5 has been completed.

NRW will undertake an audit of the revised AMP in 2016.

3. OMA

The outcome of the OMA assessment was discussed and NRW commended the increased score of 95% for emissions to air and 95% for emissions to water. KF is aware of what is required to achieve higher scores and will build these into future projects where possible and feasible.

4. No updates for the food and drink BREF, due to be finalised in 2016.

5. Monitoring returns

The following returns have been received by NRW with the following comments:

Form Gas 1 for the period 1st January to 30th June 2015 – H2S levels at 409ppm against the ELV of 200ppm. This exceedance was previously reported to NRW with AB InBev submitting the report, H2S Errors Data Recording. The previous issues with the SCADA equipment have been successfully resolved.

Form A1 for the period 1st January to 30th June 2015 – A5 and A6 are not operational.

Form W1 for the period 1st April to 30th June – all within permitted levels.

Schedule 1 Notification Form for the HCL Incident and associated incident form.

Form W1 for the period 1st July to 30th September 2015 – all within permitted levels.

Form W1 for the period 1st January to 31st March 2015 – all within permitted levels.

6. Drain project

With the proposed M4 route passing over the pipeline from the Brewery to the ETP AB Inbev will be undertaking a camera survey as part of the drains project. The last time this was done was five years ago.

With regard to the drains project on site the cross over work has now been completed and they are in the process of gathering evidence to ensure there is no risk of effluent reaching the Reens. This will demonstrate that there is no contamination in the surface water collected as well as a detailed maintenance plan to ensure all the drainage network remains sealed. Once this has been completed AB InBev will revisit the possibility of discharging to surface water again with the consent of NRW.

AB InBev use an internal computer system called SAP that has all the maintenance procedures as well as dates to undertake reviews. The system automatically produces plans for the engineers to carry out these checks.

AB InBev propose to use a product called Bioamp that reduces COD levels in the discharged effluent to the ETP.

KF has taken over management of the ETP. This has ensured that the running of the ETP is in line with AB InBevs expectations. An example of the changes already made is with the calamity tank, this was being used as a buffer tank but has now been rectified. There is now the ability to use the calamity tank if and when the water is reduced.

KF also discussed the Zone Brewery Support team. The ZBS is a global team that provides best practice to AB InBev breweries and undertakes internal audits to ensure efficiency and best practice across all the sites. ZBS also has an internal Environmental Bill.

ACTION: KF to supply a copy of the ZBS Environmental Bill to NRW.

7. OPRA

DW discussed the current OPRA profile to ensure the current score is correct. There were some minor changes to make as well as putting the profile in the NRW OPRA sheet.

ACTION: NRW to update profile and confirm OPRA score.

8. Site health and safety

KF kindly read through NRW's site visitors' sheet to ensure that NRW adhere to the requirements of AB InBev's H&S responsibilities.

ACTION: NRW to update NRW's H&S visitor's sheet in light of KF's comments.

9. EED / MCPD / ESOS

KF discussed the recently submitted ESOS application and provided a copy of the evidence pack to NRW for reference. The ESOS work fulfils the requirements of the Energy Efficiency condition in the permit and has provided useful information to the company. The work undertaken for this work has been recognised and has been nominated for a DECC award for best practice for an ESOS compliance project. As well as this AB InBev were amongst the first 200 companies to submit their application to DECC.

10. Site inspection

DW visited the site where the HCL incident occurred. All equipment and old concrete walls have now been removed with the base removed and re-laid. The temporary storage of the HCL is in a temporary bunded tanker. Once the new tanks are installed then a road barrier will be placed on the corner to ensure there is no risk of lorries driving into the tanks.



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Section 3- Enforcement Response

Only one of the boxes below should be ticked

You must take immediate action to rectify any non-compliance and prevent repetition.

Non-compliance with your permit conditions constitutes an offence and can result in criminal prosecutions and/or suspension or revocation of a permit. Please read the detailed assessment in Section 2 and the steps you need to take in Section 4 below.

Other than the provision of advice and guidance, at present we do not intend to take further enforcement action in respect of the non-compliance identified above. This does not preclude us from taking enforcement action if further relevant information comes to light or advice isn't followed.

In respect of the above non-compliance you have been issued with a warning. At present we do not intend to take further enforcement action. This does not preclude us from taking additional enforcement action if further relevant information comes to light or offences continue.

We will now consider what enforcement action is appropriate and notify you, referencing this form.

Section 4- Action(s)

Where non-compliance has been detected and an enforcement response has been selected above, this section summarises the steps you need to take to return to compliance and also provides timescales for this to be done.

Criteria Ref.	CCS Category	Action Required/Advised	Due Date
See Section 1 above			

Section 5 - Compliance notes for the Operator

To ensure you correct actual or potential non-compliance we may

- advise on corrective actions verbally or in writing
- require you to take specific actions in writing
- issue a notice
- require you to review your procedures or management system
- change some of the conditions of your permit
- decide to undertake a full review of your permit

Any breach of a permit condition is an offence and we may take legal action against you.

● We will normally provide advice and guidance to assist you to come back into compliance either after an offence is committed or where we consider that an offence is likely to be committed. This is without prejudice to any other enforcement response that we consider may be required.

● Enforcement action can include the issue of a formal caution, prosecution, the service of a notice and or suspension or revocation of the permit.

See our Enforcement and Civil Sanctions guidance for further information

This report does not relieve the site operator of the responsibility to

- ensure you comply with the conditions of the permit at all times and prevent pollution of the environment
- ensure you comply with other legislative provisions which may apply.

Non-compliance scores and categories

CCS category	Description	Score
C1	A non-compliance which could have a major environmental effect	60
C2	A non-compliance which could have a significant environmental effect	31
C3	A non-compliance which could have a minor environmental effect	4
C4	A non-compliance which has no potential environmental effect	0.1

Operational Risk Appraisal (Opra) - Compliance assessment findings may affect your Opra score and/or your charges. This score influences the resource we use to assess permit compliance.

Section 6 – General Information

Data protection notice

The information on this form will be processed by the Natural Resources Wales (NRW) to fulfill its regulatory and monitoring functions and to maintain the relevant public register(s). The NRW may also use and/or disclose it in connection with:

- offering/providing you with its literature/services relating to environmental matters
- consulting with the public, public bodies and other organisations (e.g. Health and Safety Executive, local authorities) on environmental issues
- carrying out statistical analysis, research and development on environmental issues
- providing public register information to enquirers
- investigating possible breaches of environmental law and taking any resulting action
- preventing breaches of environmental law
- assessing customer service satisfaction and improving its service
- Freedom of Information Act/Environmental Information Regulations request.

The NRW may pass it on to its agents/representatives to do these things on its behalf. You should ensure that any persons named on this form are informed of the contents of this data protection notice.

Disclosure of information

The NRW will provide a copy of this report to the public register(s). However, if you consider that any information contained in this report should not be released to the public register(s) on the grounds of commercial confidentiality, you must write to your local area office within twenty working days of receipt of this form indicating which information it concerns and why it should not be released, giving your reasons in full.

Customer charter

What can I do if I disagree with this compliance assessment report?

If you are unable to resolve the issue with your site officer, you should firstly discuss the matter with the officer's line managers. If you wish to raise your dispute further through our official Complaints and Commendations procedure, phone our general enquiry number 0300 065 3000 (Mon to Fri 08.00–18.00) and ask for the Customer Contact team or send an email to enquiries@naturalresourceswales.gov.uk. If you are still dissatisfied you can make a complaint to the Public Services Ombudsman for Wales. For advice on how to complain to the Ombudsman phone their helpline on 0845 607 0987.

